ID-00534

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ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

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February 3, 1999
Commanding Officer
Attn: Mark Taylor/1861MT
SOUTHNAVFACENGCOM
2155 Eagle Drive
P.O. Box 190010
North Charleston, SC 29419-9010

Subject: CTO-094; NSA Mid-South RFI, Millington, Tennessee

Document Transmittal: *Turkey Shoot Area Soil Removal and Sampling Work Plan, Revision 2*

Reference: Contract N62467-89-D-0318 (CLEAN II)

Dear Sir:

Please find enclosed one copy of the *Turkey Shoot Area Soil Removal and Sampling Work Plan, Revision 2*. BRAC Cleanup Team (BCT) comments on Revision 1 of this document have been addressed. Responses to BCT comments are included. As requested, copies have been distributed as shown on the attached NSA Mid-South RFI Distribution List.

Neither a binder nor Appendix A (Comprehensive Health and Safety Plan) have been provided. Please insert the enclosed materials into the binder provided with Revision 1. Both green and white covers and spines have been provided. Upon BCT approval of the work plan, the green covers and spines should be used to replace the white ones.

If you have any questions or comments of a technical nature, please contact me or Robert Smith at 901/372-7962. Comments or questions of a contractual nature should be directed to Blake Couture at the same number.

Sincerely,

EnSafe Inc.

Lawson M. Anderson

By: Lawson M. Anderson, CHMM
Task Order Manager

Enclosures: As Stated

cc: Contracts File· CTO-094 (w/out enclosure)
Project File· 0094-001-29-000-00 (w/out enclosure)
SOUTHDIV: Ms. Kim Reavis/Code 0233KR (w/out enclosure)
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Naval Support Activity Mid-South
Turkey Shoot Area Soil Removal and Sampling Work Plan, Revision 1 (November 9, 1998)
Response to Verbal TDEC Comments
February 3, 1999

The following significant (i.e., not editorial in nature) changes have been made to the work plan based on comments received verbally from TDEC on January 14, 1999:

1. Section 2.1, Figure 3. This figure (Pre-Removal Sample Locations and Estimated Extent of Excavation) has been modified. The estimated extent of excavation in the original figure did not reach the 400 mg/kg lead contour on the east side of the site. This was because the contours generated by the Geo-Ease software program did not match up exactly with the 1995 sampling data (Table 1), thus the estimated extent of excavation was manually interpolated. The figure has been revised so the initial excavation boundary will be based on removal of entire grid squares. This should make field determination of the area to be excavated easier and make it more likely that soil exceeding the cleanup level is removed. It also reduces the estimated total yardage of soil to be removed from 340 cubic yards to 324 cubic yards.

2. Section 2.2. Disposal characterization samples will be collected from 0 to 3-inches (rather than 0 to 12-inches) below land surface after removing the top layer of vegetation, roots, and organic matter. Also, one disposal characterization sample will be collected from each of three (rather than two) areas shown in revised Figure 4 (Soil Disposal Characterization). The middle area should now be more representative of worst-case conditions, since it includes grid squares 46, 59, and 67 which had the three highest concentrations of lead detected during the 1995 sampling.

3. Section 3.1. Tree stumps will be disposed of at the BFI landfill (rather than a construction and demolition debris landfill) along with the excavated soil. BFI has indicated they will accept the stumps.

4. Section 3.2. When a date has been set for removal activities to begin, the TDEC Division of Superfund, Memphis Field Office, will be notified at least 48 hours in advance of that date.

5. Section 3.5. Text has been revised to note the 0 to 3-inch disposal characterization sample depth.

6. Section 4.1, Figure 5. This figure (Confirmation Sample Locations) has been revised to reflect the grid-square-based approach to the soil removal, as described above in Item 1.

The following two changes unrelated to TDEC comments have also been made to the work plan:

7. Section 3.5. The text has been changed to note that EnSafe (rather than the Activity) will obtain the special waste permit for disposal.

8. Section 4.3, Table 4. The analytical turnaround time for the disposal characterization and pre-removal samples has been reduced from 28 days to 14 days to shorten the overall project schedule.

Naval Support Activity Mid-South
Turkey Shoot Area Soil Removal and Sampling Work Plan, Revision 1 (November 9, 1998)
Response to USEPA Comments
February 3, 1999

1. Page 9, Section 2.1 - This section shows 9 samples to be collected to determine the extent of soil removal. This section does not describe the steps to be taken if any of these samples have elevated lead (i.e., will additional samples be collected to determine the extent?) Also, this section does not describe how the samples will be collected (i.e., grab, composite).

   The text in this section has been clarified to note the samples will be 5-point composite samples, and "Should any of these samples exceed 400 mg/kg total lead, the area to be excavated will be expanded to include the grid square(s) the sample(s) were collected in, and additional pre-removal sample(s) will be collected from appropriate adjoining grid square(s) to ensure the removal of soil exceeding the cleanup level."

2. Section 2.2 - I approve this method for disposal characterization at the Turkey Shoot; however, if this method has been previously approved by USEPA I need more specifics than a telephone conversation with Jimmy Flemming.

   This section has been revised to state the characterization method is acceptable to the disposal facility. The reference to its approval by EPA has been deleted.

3. Page 19, Secion 3.5, Soil - This section states that if the soil must be disposed as hazardous waste it will be done by DRMO. If this occurs, the Navy should ensure that material, when transported to DRMO, is accompanied with a hazardous waste manifest.

   The text has been revised to state characteristic hazardous waste will be "...disposed of by NSA Mid-South through the Defense Reutilization and Marketing Office using a hazardous waste manifest."